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Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*M.C., on behalf of minor E.C. v. Meta
Platforms, Inc., et al., 4:23-cv-03398*

*D.S. filed on behalf of S.C. v. Meta
Platforms, Inc., et al., 4:23-cv-03402*

*B.B. filed on behalf of minor R.B. v. Meta
Platforms, Inc., et al., 4:23-cv-03032*

M.W., filed on behalf of Minor G.W. v. Meta

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBIT TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' THIRD
CONSOLIDATED *EX PARTE*
APPLICATION FOR APPOINTMENT
OF GUARDIANS *AD LITEM***

Platforms, Inc., et l. 4:23-cv-03824

Monica Jackson, an individually and on behalf of her minor child M.J. v. Meta Platforms, Inc., et al. 4:23-cv-03774

E.S. individually and on behalf of E.S. and J.S. individually v. Meta Platforms, Inc., et al. 4:23-cv-03682

N.B., individually and on behalf of H.B. v. Meta Platforms, Inc., et al. 4:23-cv-03635

M.H. individually and on behalf of B.H. and E.H., individually v. Meta Platforms Inc., et al. 4:23-cv-03639

L.T. on behalf of C.A. v. Meta Platforms Inc., et al. 4:23-cv-03637

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Third Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs

1 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of
 2 Plaintiffs' Third Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*
 3 ("Anderson Declaration").

4 4. True and correct copies of the following Exhibits to the Anderson Declaration
 5 are as follows and attached hereto:


- 6 • *M.C., on behalf of minor E.C. v. Meta Platforms, Inc., et al., 4:23-cv-03398*
 7 (Exhibit 1)
- 8 • *D.S. filed on behalf of S.C. v. Meta Platforms, Inc., et al., 4:23-cv-03402*
 9 (Exhibit 2)
- 10 • *B.B. filed on behalf of minor R.B. v. Meta Platforms, Inc., et al., 4:23-cv-03032*
 11 (Exhibit 3)
- 12 • *M.W., filed on behalf of minor G.W. v. Meta Platforms, Inc., et al., 4:23-cv-03824*
 13 (Exhibit 4)
- 14 • *Monica Jackson, an individually and on behalf of her minor child M.J. v. Meta*
 15 *Platforms, Inc., et al., 4:23-cv-03774* (Exhibit 5)
- 16 • *E.S. individually and on behalf of E.S. and J.S. individually v. Meta Platforms,*
 17 *Inc., et al., 4:23-cv-03682* (Exhibit 6)
- 18 • *N.B., individually and on behalf of H.B. v. Meta Platforms, Inc., et al., 4:23-cv-*
 19 *03635* (Exhibit 7)
- 20 • *M.H. individually and on behalf of B.H. and E.H., individually v. Meta Platforms,*
 21 *Inc., et al., 4:23-cv-03639* (Exhibit 8)
- 22 • *L.T. on behalf of C.A. v. Meta Platforms, Inc., et al., 4:23-cv-03637* (Exhibit 9)

23 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, I asked for, and Defendants agreed to,
 24 a standing stipulation that the individual applications seeking appointment of guardians ad litem
 25 in this case may be filed under seal. Liaison Counsel for Defendants also confirmed that, in so
 26 stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders
 27 in the future to unseal individual applications and/or require parents who wish to proceed
 28 pseudonymously going forward make a showing of good cause.

1 I declare under penalty of perjury pursuant to the laws of the United States of America that
2 the foregoing is true and correct.

3
4 Dated: August 7, 2023

Respectfully submitted,

5 
6 Jennie Lee Anderson
7 *Plaintiffs' Liaison Counsel*

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